

Exhibit A

From: Ronnie Spiegel

Sent: Tuesday, November 22, 2016 12:46 PM

To: Walters, Neal <WaltersN@ballardspahr.com>

Cc: Vicky Romanenko <Vicky@cuneolaw.com>; Rosenthal, Sloane Kuney <SRosenthal@gibsondunn.com>; Evelyn Li <evelyn@cuneolaw.com>; adam.hemlock@weil.com; Lara.Trager@weil.com; Steve Williams <swilliams@cpmlegal.com>; 'Casselman, Jill S.' <JCasselman@RobinsKaplan.com>; Nicoud, Trey <TNicoud@gibsondunn.com>; 'Demetrius Lambrinos (DLambrinos@cpmlegal.com)' <DLambrinos@cpmlegal.com>; Schwing, Austin <ASchwing@gibsondunn.com>; asmedley@winston.com

Subject: RE: Draft email to SOA counsel

Hi Neal,

Thanks for your email. Regarding the "shadow copy," we are happy to speak when you have a sense of scope. We are also happy to speak or answer any questions you may have regarding logistics of production. I know that our group will be busy with briefing next week, but I can check on whether a call would work and best times.

Best wishes for Thanksgiving,

Ronnie

Ronnie Spiegel | **Hagens Berman Sobol Shapiro LLP** | Direct: (206) 268-9343

From: Walters, Neal [<mailto:WaltersN@ballardspahr.com>]

Sent: Tuesday, November 22, 2016 11:16 AM

To: Ronnie Spiegel

Cc: Vicky Romanenko; Rosenthal, Sloane Kuney; Evelyn Li; adam.hemlock@weil.com; Lara.Trager@weil.com; Steve Williams; 'Casselman, Jill S.'; Nicoud, Trey; 'Demetrius Lambrinos (DLambrinos@cpmlegal.com)'; Schwing, Austin; asmedley@winston.com

Subject: RE: Draft email to SOA counsel

Ronnie,

Thank you for your e-mail, which comports with my understanding of the agreement we reached at last week's mediation, resolving all subpoena requests to Subaru of America. As for the remaining questions listed below, I have been in regular touch with Subaru to assess the logistics of attempting to produce what I am calling a redacted "shadow copy" of the data for the lawyers, but do not have an answer yet on the scope of what it would take to redact [REDACTED] every data set. I believe that we will be producing the [REDACTED] cost data, [REDACTED], but need to speak to the relevant person (who has been away) as to how we will accomplish this.

Given the holiday, and so we can stay on top of this, let me know if you would like to have a call next Tuesday, to check on the logistics.

Neal Walters

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From: Ronnie Spiegel [<mailto:ronnie@hbsslaw.com>]

Sent: Friday, November 18, 2016 3:29 PM

To: Walters, Neal (NJ)

Cc: Vicky Romanenko; Rosenthal, Sloane Kuney; Evelyn Li; adam.hemlock@weil.com; Lara.Trager@weil.com; Steve Williams; 'Casselman, Jill S.'; Nicoud, Trey; 'Demetrius Lambrinos (DLambrinos@cpmlegal.com)'; Schwing, Austin; asmedley@winston.com

Subject: RE: Draft email to SOA counsel

Hi Neal,

Thank you for your participation at the mediation on Tuesday. This email is to memorialize the terms that we discussed at the mediation, and to seek final confirmation and agreement between the parties and SOA. Please note that Auto Dealer Plaintiffs may be providing you with a separate email regarding their request for a declaration.

Items to be produced by SOA:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidentiality related to SOA's [REDACTED] information:

[REDACTED]

Costs:

[REDACTED]

Remaining questions:

SOA said that it would confirm whether it would produce to the parties' counsel a set of [REDACTED] documents with [REDACTED] information redacted (and to estimate the cost of such redaction).

Please confirm that, consistent with your November 3, 2016 e-mail to the parties, and subject to the existing protective order, SOA will produce [REDACTED] cost data, [REDACTED].

In light of the above agreements, the parties agree to withdraw their motion to compel as to SOA.

Please feel free to reach out with any further questions.

Kind regards,
Ronnie

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